

UNITED STATES DISTRICT COURT  
*for* THE DISTRICT OF MINNESOTA

**WOODSTONE LIMITED  
PARTNERSHIP; LOFTS AT  
FARMERS MARKET LLC;**

*Plaintiffs,*

*vs.*

**CITY OF SAINT PAUL,  
MINNESOTA, A MINNESOTA  
CHARTER CITY; CITY COUNCIL  
OF THE CITY OF SAINT PAUL;  
ANGIE WIESE, IN HER OFFICIAL  
CAPACITY AS THE DIRECTOR  
OF THE DEPARTMENT OF  
SAFETY AND INSPECTIONS OF  
THE CITY OF SAINT PAUL;  
MAYOR MELVIN CARTER, IN  
HIS OFFICIAL CAPACITY AS  
MAYOR OF THE CITY OF SAINT  
PAUL; AND JOHN DOE,**

*Defendants.*

**Court File No. 22-CV-1589 NEB-JFD**

**CITY OF SAINT PAUL  
DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT**

Defendants City of Saint Paul, Minnesota; City Council of the City of Saint Paul; Angie Wiese in her official capacity as Director of the Department of Safety and Inspections of the City of Saint Paul; and Mayor Melvin Carter in his official capacity as Mayor of the City of Saint Paul (“City of Saint Paul Defendants”), hereby move the Court, pursuant to Rule 56 of the Federal Rules of Civil Procedure, for an order for summary judgment herein, granting their request to dismiss Plaintiffs’ Complaint with prejudice and to enter judgment in their favor as to all of Plaintiff’s causes of action. This Motion is made upon all of the files, records, and proceedings herein, the memoranda of law and

accompanying declarations and exhibits filed in support of this motion, and such additional documents and/or arguments as may be requested or permitted by the Court.

Dated: November 7, 2022

LYNDSEY M. OLSON  
SAINT PAUL CITY ATTORNEY

*s/ Megan D. Hafner*

Megan D. Hafner, # 293751

Kyle Citta, #0397000

Assistant City Attorneys

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Minnesota, City Council of the City of Saint  
Paul; Angie Wiese; and Mayor Melvin Carter*

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